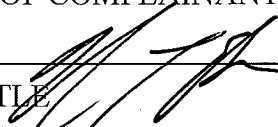



## CRIMINAL COMPLAINT

(Electronically Submitted)

<b>United States District Court</b>  United States of America v. <b>Oscar Tapia-Castro</b> ; DOB: 2005; United States <b>Roney Ulicer Lara-Galdamez</b> ; DOB: 2006; Honduras	<b>DISTRICT of ARIZONA</b>  DOCKET NO.  MAGISTRATE'S CASE NO. 25-09176MJ
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i), 18 USC 111,	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> <b>Count 1:</b> On or about June 26, 2025, in the District of Arizona, <b>Oscar Tapia-Castro</b> and <b>Roney Ulicer Lara-Galdamez</b> , named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, and did so for the purpose of private financial gain, and placed in jeopardy the life of any person; in violation of <b>Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).</b> <b>Count 2:</b> On or about June 26, 2025, in the District of Arizona, <b>Oscar Tapia-Castro</b> did intentionally and forcibly assault United States Border Patrol Agent A.M., an officer of the United States, while he was engaged in and on account of the performance of his official duties, that is, <b>Oscar Tapia-Castro</b> did use a deadly and dangerous weapon, to wit: the that is, <b>Oscar Tapia-Castro</b> intentionally rammed the vehicle he was operating, a deadly and dangerous weapon, at a pursuing vehicle being driven by Agent A.M., in violation of Title 18, United States Code, Sections 111(a)(1) & (b). <b>Count 3:</b> On or about June 26, 2025, in the District of Arizona, <b>Oscar Tapia-Castro</b> did intentionally and forcibly assault United States Acting Supervisory Border Patrol Agent D.W., an officer of the United States, while he was engaged in and on account of the performance of his official duties, that is, <b>Oscar Tapia-Castro</b> intentionally rammed using the vehicle he was operating, a deadly and dangerous weapon, at a pursuing vehicle being driven by Agent D.W., in violation of Title 18, United States Code, Sections 111(a)(1) & (b).	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b> On June 26, 2025, in the District of Arizona (North Komelik), at approximately 9:00 p.m. Border Patrol Agents (BPAs) working the Immigration Check Point located approximately on Mile Marker (MM) 30 on Federal Route (FR) 15 observed a blue 2004 Dodge Ram 1500, with license plate MEA050, travelling south bound on FR 15 at a high rate of speed, running over speed bumps and making loud noises. BPAs started making hand motions towards the truck trying to communicate for it to slow down and follow the posted speed limit signs. The driver of the vehicle, later identified as <b>Oscar Tapia-Castro</b> , abruptly stopped the vehicle. <b>TAPIA</b> lowered his window and started speaking with BPAs.	
<b>CONTINUED ON NEXT PAGE.</b>	
<b>MATERIAL WITNESS IN RELATION TO THE CHARGE:</b>	
Detention Requested  <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	SIGNATURE OF COMPLAINANT    OFFICIAL TITLE Border Patrol Agent
SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup> 	DATE June 30, 2025

<sup>1)</sup> See Federal rules of Criminal Procedure Rules 3, 4.1, and 54  
 Reviewing AUSA: Enderle

BPA's informed **TAPIA** that he was at a United States Border Patrol checkpoint and that the posted speed limit are in place for the safety of the public and agents working the checkpoint. During this interaction BPA's noticed the passenger, later identified as **Roney Ulicer Lara-Galdamez**, displaying nervous behavior so they decided to ask **LARA** as to his citizenship. BPA's asked **LARA** what country he was a citizen of. **LARA** looked at **TAPIA** and then looked down the road multiple times, as if he were waiting for **TAPIA** to drive off. BPA's then asked **LARA** if he had documents to allow him to remain in the United States legally. **LARA** replied that he did not have his documents on him. BPA's asked **TAPIA** if he was a United States citizen, he replied that he was. **TAPIA** then stopped talking to BPA's and made a phone call. **TAPIA** told the subject on the phone that the police had stopped him and asked the subject what he should do. **LARA** then squared his shoulders against the seat and looked straight forward as if he were preparing for the vehicle to start moving. **TAPIA** started to drive forward while BPA's were still conducting their immigration inspection. BPA's ordered **TAPIA** to stop the forward motion of the vehicle until they had concluded their immigration inspection. When other vehicles began to approach, BPA's ordered **TAPIA** to move his car into the secondary inspection area of the checkpoint. Instead of following BPA's instructions, **TAPIA** drove southbound past the checkpoint at a high rate of speed.

BPA's, including BPA A.M., and Acting Supervisory Border Patrol Agent (ASBPA) D.W., pursued the truck in their marked units activating their emergency equipment. **TAPIA** did not yield to BPA's attempting to pull him over. **TAPIA** turned westbound off FR15 onto a dirt road near MM 27.5. **TAPIA** was swerving back and forth to blind BPA's with dust. **TAPIA** was driving recklessly, trying to lose BPA's in the rough brush, dust, and deep washes. **TAPIA** then made a U-turn and ASBPA D.W. made a U-turn behind him. **TAPIA** began approaching BPA A.M.'s vehicle. BPA A.M. moved onto the side of the dirt road to allow for **TAPIA** and BPA D.W. to travel back. As **TAPIA** approached BPA A.M.'s location, **TAPIA** stopped, placed his vehicle in reverse, and rammed ASBPA D.W.'s vehicle. **TAPIA** then placed his vehicle in drive and drove directly towards BPA A.M.'s driver door. To avoid the crash, BPA A.M. accelerated to get out of the way, and **TAPIA** rammed into the driver side rear quarter panel of BPA A.M.'s vehicle. **TAPIA** continued to flee off-road. BPA's located the vehicle, abandoned and inoperable. BPA's located and followed foot-sign from the vehicle. BPA's were able to locate both **TAPIA** and **LARA** inside the cab of an old utility truck on a property known as the Old Chicken Farm. **TAPIA** and **LARA** were placed under arrest.

After waiving his *Miranda* rights, **TAPIA** stated that he and **LARA** were travelling from Phoenix, Arizona to Nogales, Arizona to meet some girls. **TAPIA** could not give any more information on who the girls were and where he was going to meet them. BPA's questioned **TAPIA** as to why he did not use Interstate 10, which is the most direct and commonly used route to go to Nogales from Phoenix. **TAPIA** stated it was because he took a wrong turn. **TAPIA** said he fled from BPA's and tried to evade them because he knew **LARA** was an illegal alien.

After waiving his *Miranda* rights, **LARA** stated that he had legally entered the United States approximately four years ago to attend school, but overstayed his visa. **LARA** stated he and **TAPIA** were travelling from Phoenix, AZ to the Tohono O'odham Indian Reservation to pick up illegal aliens. **LARA** stated **TAPIA** asked to use **LARA**'s truck to pick up "pollos". **LARA** stated that in return for using his truck **TAPIA** would fill it up with gasoline as payment. **LARA** gave consent for agents to search his phone. After BPA's searched his phone, they discovered a conversation between **LARA** and **TAPIA** discussing how they would be paid \$1,200 USD per each person they smuggled further into the United States. **LARA** stated to BPA's he did not drive because he is an illegal alien, and he thought it would be too risky. **LARA** stated once BPA's contacted them, he knew it was over and wanted to turn himself in. He said that **TAPIA** decided to flee from BPA's at a high rate of speed, and that he wanted to get out of the vehicle and give himself up to BPA's but couldn't. **LARA** repeatedly told **TAPIA** to stop during the pursuit.